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Rachel Perillo

July 16, 2024

By ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Terrence Williams
21 Cr. 603 (VEC)

Dear Judge Caproni:

I am the attorney for Mr. Williams in the above referenced matter, having been appointed pursuant to the Criminal Justice Act. This letter is respectfully submitted to seek the Court's intervention in ensuring that Mr. Williams is provided with necessary medical treatment.

Mr. Williams is currently serving a ten-year sentence at FCI Sheridan located outside Portland, Oregon, which is in close proximity to his family in Seattle, Washington. By Order of the Court, Mr. Williams was recently produced in the Southern District of New York for purposes of testifying at the trial of his co-defendant, William James Washington. On June 26, 2024, Mr. Williams invoked his Fifth Amendment right against self-incrimination and chose not to testify at Mr. Washington's trial. The Court found that Mr. Williams appropriately invoked such right and therefore could not testify, and was free to return to Oregon.

On approximately July 3, 2024, Mr. Williams arrived at Grady County Jail in Chickasha, Oklahoma where he remains detained awaiting transport back to FCI Sheridan. Upon arriving in Oklahoma, Mr. Williams began experiencing severe pain and

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swelling in his right ankle and foot which has continued to worsen over time. As the Court is aware, Mr. Williams previously suffered a ruptured Achilles on his right ankle and underwent surgery while in custody at the Brooklyn Metropolitan Detention Center in 2022. Mr. Williams informs me that after about a week of being in excruciating pain he met with a doctor at the Grady County jail who informed him that he likely tore his Achilles again and appears to have a cellulitis infection. According to Mr. Williams, the doctor says he will need an MRI but that because he will be leaving soon to return to FCI Sheridan the MRI cannot be ordered. Mr. Williams states that he has been provided with ibuprofen and prescribed antibiotics; however, the medications are providing no relief, his ankle and foot remain extremely swollen as of today, and he continues to be in agonizing pain. He has also been prescribed blood pressure medication because his blood pressure has been highly elevated, but that has also provided little to no relief. Mr. Williams states he has been told by jail staff that he cannot go to a hospital and that essentially there is nothing else that can be done until he returns to FCI Sheridan.

My office has consulted with the U.S. Marshals Service of the Southern District of New York who state that Mr. Williams is expected to be taken back to FCI Sheridan "by the end of the month." However, Mr. Williams also states that just a few days ago the Marshals picked up inmates at the Grady County jail whom he believes were headed to Seattle, yet Mr. Williams was not taken with them.

It has been approximately three weeks since Mr. Williams was taken from FCI Sheridan and brought to New York through no fault of his own. The fact that he now sits in a transfer facility while suffering a painful medical condition, unable to receive necessary medical treatment because of the timing of his departure from the jail is unjust and inhumane. It is also worth noting that his time away from FCI Sheridan has prevented him from seeing his wife and children, and he is also missing out on FSA credits that he would otherwise be earning at FCI Sheridan.

Given these circumstances, it is respectfully requested that the Court direct Mr. Williams' immediate transport to FCI Sheridan so that he can obtain the medical treatment that he needs and continue serving his sentence, or in the alternative,

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direct that Mr. Williams be provided with immediate medical treatment that will adequately alleviate his pain.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,
/s/
David Stern

The Government must respond to this request by **Friday, July 19 at 12:00 P.M.**

SO ORDERED.

 7/17/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE